

1                   Whereupon,

2                               JULIE C. EDISON

3                   having been first duly sworn, was called as a  
4       witness herein and was examined and testified as follows:

5                               DIRECT EXAMINATION

6                   BY MR. ROMNEY:

7           Q       Ms. Edison, would you state your name for the  
8       record, please?

9           A       Julie Channing Edison.

10          Q       Would you state your address, please?

11          A       7000 Falls Reach Drive, Number 307, Falls Church,  
12       Virginia 22043.

13          Q       Are you employed, ma'am?

14          A       I am self-employed, sir.

15          Q       And what is the nature of your employment?

16          A       I am a handwriting expert.

17          Q       And do you have a company name?

18          A       My company name is Communique Document Examiners.

19          Q       I'll ask you to take before you what's been marked  
20       for identification as RB/PB Exhibit No. 12. Do you  
21       recognize that document?

22          A       That's my statement of qualifications.

23          Q       Is that a document that you prepared?

24          A       Yes, it is.

25          Q       And does that accurately list the qualifications

1 and your training in handwriting evaluation?

2 A Yes, it does.

3 Q Now, you've been present during the testimony of  
4 Ms. Bolsover. Is that correct?

5 A Yes.

6 Q And Ms. Bolsover made a distinction between  
7 graphoanalysis and questioned document examination. Do you  
8 recall that testimony, ma'am?

9 A Yes. Yes, I do.

10 Q Do you profess to have some training in  
11 questioned document examination?

12 A Yes.

13 Q Do you also have training in graphoanalysis?

14 A I am a master graphoanalyst.

15 Q Would you explain to the Court your educational  
16 background, please?

17 A Yes. I have a Bachelor's of Arts degree from  
18 Washington University in St. Louis, Missouri. I attended  
19 additional classes at University of Missouri, St. Louis, for  
20 computer training. I did additional coursework at  
21 Washington University for journalism.

22 Additionally, I am in a training program at The  
23 World Association of Document Examination, an eight-year  
24 training program, for the purposes of professional  
25 handwriting authentication.

1           Q     Have you listed on your qualifications summary  
2     which is RB/PB Exhibit No. 12 the courses that you have  
3     taken in examination of questioned documents?

4           A     Yes, I have.

5           Q     And have you also listed on that the courses that  
6     you have taken in connection with The World Association of  
7     Document Examiners?

8           A     Yes.

9           Q     Would you explain to the Court what The World  
10    Association of Document Examiners is?

11          A     The World Association of Document Examiners is a  
12    private organization founded in 1973 devoted for the  
13    purposes of examining and evaluating documents, not just  
14    questioned handwriting, but in all areas.

15          Q     Are there any minimum standards for admission into  
16    this organization?

17          A     You have to be invited.

18          Q     And what is the process for determining who would  
19    receive an invitation, please?

20          A     You have to be either invited by one of the  
21    existing members who is a certified examiner -- I got  
22    invited by enrollment in the Master's program for the  
23    International Graphoanalysis Society. But it's by  
24    invitation only.

25          Q     And is there a training program that is part of

1 The World Association of Document Examiners?

2 A Yes.

3 Q And are you involved in that?

4 A Yes.

5 Q And how long have you been studying that?

6 A Two and a half years.

7 Q And what is the completion of that certification?

8 A Completing eight years of training, appearing in  
9 court five times, writing two articles, and passing an oral  
10 and written examination.

11 MR. ROMNEY: Your Honor, I would move the  
12 admission of RB/PB Exhibit No. 12.

13 JUDGE STEINBERG: Any objection?

14 MS. LANCASTER: No, sir. I don't have any  
15 objections to her resume.

16 JUDGE STEINBERG: RB/PB Exhibit 12 is received.

17 (The document referred to,  
18 previously identified as RB/PB  
19 Exhibit No. 12, was received  
20 in evidence.)

21 BY MR. ROMNEY:

22 Q RB/PB Exhibit No. 12 also demonstrates that you  
23 are a member of the American College of Forensic Examiners.  
24 Is that correct?

25 A Yes.

1           Q     Would you explain to the Court what that is,  
2     please?

3           A     Yes. That is a 10,000 member organization based  
4     on excellence in all forensic sciences. Again, it's by  
5     invitation only. I was invited to join by my first  
6     instructor in document examination, Mr. Simeone, a private  
7     examiner in Maryland.

8           Q     Now, have you been retained in your work life to  
9     do questioned document examination?

10          A     Yes.

11          Q     Have you been retained to do that on behalf of  
12     private litigants in different lawsuits?

13          A     Yes.

14          Q     Would you explain -- have you ever been certified  
15     as a witness at a trial to testify?

16          A     I have never testified in a courtroom situation.

17          Q     Have you submitted documents to courts for  
18     examination in connection with cases?

19          A     Yes, I have.

20          Q     And have those documents been received by courts  
21     in cases?

22          A     Yes, sir. They have.

23          Q     And approximately how many occasions has that been  
24     done on your behalf, ma'am?

25          A     Six cases, sir.

1           Q     And have you listed those on the front page of  
2     RB/PB Exhibit 12?

3           A     Yes.

4           Q     Would you explain to the Court the length of your  
5     training in questioned document examination and some of the  
6     highlights of that training, please?

7           A     My training began in the summer of 1998. I had a  
8     five-part class with Mr. Simeone of Maryland. I learned  
9     about handwriting identification, indented handwriting --

10           JUDGE STEINBERG: Was that indented?

11           THE WITNESS: Yes. It's an electrostatic  
12     detection apparatus. If somebody writes a note on a pad of  
13     paper, tears off the top sheet, we can use the machine to  
14     determine the indented writing and find out the nature of  
15     the note. So I was trained in doing that.

16           Also in determining any alterations to documents  
17     such as ink tampering, typewriting, discrepancies in  
18     typewritten notes, even notes that are clamped together or  
19     stapled.

20           Mr. Simeone also gave to me a number of forms with  
21     which to use for making request samples should the need  
22     arise, if we had any cases of fraudulent checks or  
23     fraudulent documents, we had like documents to use to submit  
24     test samples from suspects.

25           BY MR. ROMNEY:

1           Q     The second page of your exhibit, RB/PB Exhibit  
2     No. 12, lists various training institute courses.

3           A     Yes, sir.

4           Q     Like The World Association of Document Examiners.

5           A     Correct.

6           Q     Would you briefly tell the Court what those  
7     involved?

8           A     Yes. Oral and written communications 204, how to  
9     handle the trial procedure or cross-examination, what I'm  
10    doing right now.

11                Expert testimony through direct examination,  
12    again.

13                The history of writing instruments, we started with the  
14    pens dating back to ancient China and ancient Egypt, all the  
15    way up to the present day, ink pens of all kinds, and how to  
16    determine the differences in such writing instruments.  
17    Basic examination and identification of handwriting, what to  
18    look for such as movement, form, pictorial appearance.

19                104, professional ethics, care and custody of  
20    documents, recording procedures, how to protect documents  
21    while they're under examination, good business practice with  
22    regard to a questioned document examiner's business  
23    practice. And, of course, professional ethics, which are  
24    really the hallmark of our profession.

25                Professional aspects of document examination,

1 again, examining the whole document, not just the  
2 handwriting, looking for document tampering as well as  
3 suspect handwriting.

4 102, deciphering obliterations, alterations,  
5 indented writing, other related problems, in addition to the  
6 ESD machine, using infrared, ultraviolet lights to detect if  
7 any ink has been tampered with, using two different kinds of  
8 ink, if any numbers have been altered, say, on medical  
9 forms, White-Out. If a wheel has had an insertion sheet  
10 added to it with one set of staples as opposed to two sets  
11 of staples, to see if there's any tampering in documents  
12 other than the handwriting.

13 And then basic examination and identification of  
14 handwriting, which was basically the 101 course, the  
15 introductory course.

16 Q On the first page of your document, RB/PB Exhibit  
17 No. 12, there is listed an examination of questioned  
18 documents course at George Washington University. Would you  
19 explain that to the Court, please?

20 A Yes. It was a summary of everything that I said  
21 today, based on the text "Scientific Examination of  
22 Questioned Documents" by Ordway Hilton.

23 In addition to that, we got a chance to look at  
24 suspect forms such as passports, birth certificates, how to  
25 determine fraudulent documents based on seals, photographs,



1 anything that has been scanned and such.

2 Q Do you believe that you are possessed of  
3 specialized skill which will aid this Court in making some  
4 determinations that it needs to make in this matter?

5 A Yes, sir.

6 MR. ROMNEY: Your Honor, I move the admission of  
7 Ms. Edison as an expert witness.

8 MR. PEDIGO: No objection.

9 MS. LANCASTER: I'd like to have an opportunity to  
10 voir dire.

11 JUDGE STEINBERG: Sure.

12 VOIR DIRE EXAMINATION

13 BY MS. LANCASTER:

14 Q Ms. Edison, I'm looking at your resume and it  
15 appears that you have -- under qualifications summary, that  
16 you have been a professional handwriting expert since 1998?

17 A Yes, ma'am.

18 Q And when did you take your first forensic document  
19 examination course?

20 A 1999.

21 Q Okay.

22 A Excuse me. Let me correct that. My first course  
23 was July 1998 with Mr. Simeone. My first course with WADE  
24 was in 1999.

25 Q Okay. Who is Mr. Simeone?

1           A     Ron Simeone is a private document examiner in  
2     Wheaton, Maryland in private practice for nine years and  
3     instructor at the Prince George's County Community College  
4     in document examination.

5           Q     Is he a member of -- you heard me asking about --  
6     now, what's what the name of it --

7           A     He's a member of the --

8           Q     Wait a minute. Let me finish my question, please.  
9     You heard me ask about ABFDE?

10          A     Correct.

11          Q     Is Mr. Simeone a member of ABFDE?

12          A     No, he is not.

13          Q     Is he qualified to be a member of ABFDE?

14          A     I don't know.

15          Q     Has he ever served an apprenticeship under anyone  
16     who would have had the minimum qualifications recognized by  
17     ABFDE?

18          A     Absolutely.

19          Q     Oh, really? Who did he work for?

20          A     He was an apprentice to the late Felix Klein of  
21     New York City, who was an international questioned document  
22     examiner who worked for the United Nations, private  
23     litigants, the Pepsi Cola Company, and has an extensive  
24     resume. Mr. Klein passed away in 1994.

25          Q     Okay. Did Mr. Simeone --

1 JUDGE STEINBERG: You don't have to hold up the  
2 microphone. The microphone just feeds into the tape  
3 recorder and doesn't amplify your voice.

4 THE WITNESS: Okay.

5 JUDGE STEINBERG: Try to keep your voice up.

6 BY MS. LANCASTER:

7 Q Mr. Simeone ever worked in a crime lab?

8 A I don't know.

9 Q And you stated you took one course from him?

10 A Correct.

11 Q In the summer of 1998?

12 A Correct.

13 Q How many hours was that course?

14 A Twenty hours.

15 Q Okay. How many days? Did it meet weekly? How  
16 was the class arranged?

17 A We met once a week, five formal class periods, and  
18 then a sixth session where we examined a document.

19 Q So you examined one document during that class?

20 A No, ma'am. We examined close to 30.

21 Q I believe you stated -- all right. That was your  
22 first class that you ever took in doc examination?

23 A Yes.

24 Q What was your second class?

25 A The George Washington University examination of

1 questioned document class, spring 1999.

2 Q And who taught that class?

3 A Mr. Thomas Spitzer, a retired FBI agent.

4 Q Okay. And you stated that you then -- or  
5 somewhere in here you started taking classes at The World  
6 Association of Document Examiners?

7 A Correct.

8 JUDGE STEINBERG: It's on page 2.

9 MS. LANCASTER: Right. That's on page 2.

10 THE WITNESS: Correct.

11 BY MS. LANCASTER:

12 Q Now, you've got resident training. What does that  
13 mean?

14 A The correct name for those courses is Resident  
15 Training Institute.

16 Q Okay. Did you actually go off to college, go off  
17 to this school to take these classes?

18 A Correct.

19 Q Where is this school located?

20 A Well, the society is based in Chicago, Illinois.  
21 We hold these courses at our annual convention and go on  
22 site to take the courses.

23 Q Oh, so you didn't go to a college, you went to  
24 like a yearly convention type thing and took them?

25 A But it is a training program. We have --

1           Q     Excuse me. I would ask that you answer my  
2 question, please.

3           JUDGE STEINBERG: I thought she was.

4           MR. ROMNEY: I thought she was, too, Your Honor.

5           MS. LANCASTER: My question required a yes or no  
6 answer, Your Honor.

7           JUDGE STEINBERG: Okay. Ask it again.

8           BY MS. LANCASTER:

9           Q     You would go to some yearly meeting and take these  
10 courses.

11          A     Correct.

12          Q     Are these all the courses that you've taken?

13          A     Correct.

14          Q     How about the -- right above, at the top of page  
15 2, it says -- there are also some 90-minute courses?

16          A     Correct.

17          Q     Did you take those at the year meeting also?

18          A     Correct.

19          Q     Have you ever served any type of an apprenticeship  
20 under someone whose qualifications would meet the minimum  
21 standards provided by the ABFDE?

22          A     I am unaware of those standards, so I can't  
23 properly answer that question.

24          Q     Okay. Well, you heard the standards when  
25 Ms. Bolsover was testifying, didn't you?

1           A     My answer to that question is --

2           Q     Excuse me. You heard the qualifications when she  
3 was testifying.

4           A     Correct.

5           Q     Would you like me to repeat them? I'll be happy  
6 to do that. Or do you recall what they are?

7           A     I recall what they are.

8           Q     Okay. Have you ever served any type of an  
9 apprenticeship under someone who would meet those standards?

10          A     In a manner of speaking, yes.

11          Q     Yes or no.

12          A     Yes.

13          Q     Okay. Who?

14          A     Mr. Simeone.

15          Q     All right. And your whole apprenticeship with  
16 Mr. Simeone consisted of one course, the one you have told  
17 us about?

18          A     In addition, I --

19          Q     Yes or no, please.

20          A     Correct.

21          Q     Is The World Association of Document Examiners  
22 commonly referred to as WADE?

23          A     Yes.

24          Q     In all of your training, how many cases have you  
25 actually had?

1 A I've handled 12 cases.

2 Q And in the cases that you refer to, those are the  
3 ones listed on the first page of your resume?

4 A The cases listed on the first page of the resume  
5 involved court matters, ma'am.

6 Q Okay. So some of the 12 are in addition to these?

7 A That's correct.

8 Q Okay. Has a court ever accepted you in a hearing  
9 as an expert?

10 A No.

11 Q Have you ever participated in any court case where  
12 there was a legal expert on the other side of the case?

13 A I don't remember. I don't think so.

14 Q So your qualifications have never been challenged  
15 by anyone else who would be qualified to challenge them?  
16 Is that correct?

17 A Yes.

18 Q Isn't the training you received from WADE  
19 traditionally done by correspondence course?

20 A No.

21 Q Isn't the primary training and purpose of WADE to  
22 provide graphology training?

23 A Absolutely not.

24 Q And you stated you were invited to join WADE?

25 A Correct.

1           Q     Isn't it true that WADE has over 13,000 members  
2     and over 17,000 diplomats?

3           A     Not to my knowledge.

4           Q     How many members do they have, to your knowledge?

5           A     A couple of hundred.

6           Q     Really?

7           A     Mm-hmm.

8           Q     Are you familiar with any documents that have been  
9     written by the American Bar Association concerning WADE?

10          A     No.

11          Q     So you're not familiar with that American Bar  
12     Association says that WADE is a diploma mill?

13          A     No, I am not.

14          Q     Okay. And that their certification process lacks  
15     objectivity? You never heard of that before?

16          A     I've never heard that before.

17          Q     And that frequently the credentials received  
18     through WADE are called checkbook credentials?

19          A     What's the question?

20          Q     Have you ever heard that before?

21          A     I've never heard that.

22          Q     You stated you were initially invited to WADE  
23     because you had a Master of Graphoanalysis, some type of  
24     certification in graphoanalysis. Is that correct?

25          A     Yes. I was invited when I took the advanced



1 program in graphoanalysis.

2 Q And where did you take the advanced program in  
3 graphoanalysis?

4 A The International Graphoanalysis Society.

5 Q Have anything to do with WADE?

6 A No. They're separate organizations.

7 Q Don't they share the exact same address?

8 A They share the same address, but they are separate  
9 organizations.

10 Q Okay. And don't they also share an address with  
11 Nelson Hall Publishers?

12 A Correct. They do.

13 Q And you buy your books and stuff like that through  
14 Nelson Hall Publishers?

15 A Not necessarily.

16 Q Okay. WADE was originally started by whom?  
17 Do you know?

18 A Edna Robertson.

19 Q Really? Have you heard of Robert O'Block?

20 A That's the American College of Forensic Examiners.

21 Q Okay. I've gotten my different ones mixed up.  
22 I'm sorry.

23 How many courses does it take to become a  
24 certified graphoanalyst?

25 A Thirty courses.

1 Q And how many hours is that?

2 A It's two years.

3 Q How many hours is that?

4 A Twenty hours a week for two years.

5 Q Is that an in-house course? Do you go there and  
6 study?

7 A That's a correspondence course.

8 Q Okay. So that's a correspondence course.

9 A Correct.

10 Q So how do you come up with 20 hours? Is that how  
11 long it took you a week to do the correspondence?

12 A Correct.

13 Q And how many hours did it take you to get your  
14 Master Graphoanalyst designation?

15 A It took me one year, 20 hours a week for one year.

16 Q The basic graphoanalysis course consists of how  
17 many lessons?

18 A Would you repeat your question, please?

19 Q The basic graphoanalysis course consists of how  
20 many lessons?

21 A Are you referring to the first course?

22 Q Yes.

23 A Thirty lessons, ma'am.

24 Q Okay. Explain to me what graphoanalysis is.

25 A Graphoanalysis is a form of graphology,

1     handwriting analysis, that was perfected by the late Dr.  
2     M.N. Bunker in 1929. The organization has been in existence  
3     since that year.

4             Q     But what is it?

5             A     It's a form of handwriting analysis for the  
6     identification of personality assessment.

7             Q     Okay. Did you practice graphoanalysis?

8             A     I still do.

9             Q     And you've been practicing graphoanalysis since  
10    when?

11            A     1996.

12                   JUDGE STEINBERG: I didn't get the date.

13                   THE WITNESS: 1996.

14                   JUDGE STEINBERG: Thank you.

15                   BY MS. LANCASTER:

16            Q     Do either IGAS or WADE offer a home study course  
17    in questioned document examination?

18            A     No. IGAS only works with graphoanalysis and WADE  
19    only works with document examination.

20            Q     Okay. So WADE doesn't offer any home study  
21    course?

22            A     No, ma'am. It does not.

23            Q     All of their courses are offered at like these  
24    yearly meetings?

25            A     Correct.

1           Q     You've never worked at any type of a lab, have  
2     you?

3           A     No.

4           Q     I believe in looking at the cases that you have  
5     listed or the courses that you've listed on page 2 and 3 of  
6     your resume, the 90-minute courses add up to 15 hours. Is  
7     that correct?

8           A     Correct.

9           Q     And the other 30-minute seminars, I believe that  
10    there are 46 of those listed. Is that correct?

11          A     Correct.

12          Q     So that would add up to 23 hours total?

13          A     Yes.

14          Q     Now, when you go into a seminar, I'm assuming that  
15    these seminars, these meetings are kind of like bar meetings  
16    which most of the lawyers can relate to. When you go in,  
17    there's like a welcome and introduction and they introduce  
18    all of the important people that are in the room and then  
19    you have a speaker? Is that kind of the format that they  
20    follow?

21          A     Not exactly.

22          Q     Is it similar to that?

23          A     It's a working seminar, ma'am. We have extensive  
24    handouts, the subjects are very intensive and we go right to  
25    work.

1 Q I'm asking about the format. They don't come in,  
2 they don't start off with a welcome?

3 A The welcome is done ahead of time.

4 Q Yes or no, please.

5 A No.

6 Q So they come in and they just -- you immediately  
7 go to work.

8 A Correct.

9 Q Do you know if you would be qualified to get a job  
10 at the postal forensic lab?

11 A I don't know.

12 Q What do you think?

13 A I don't know.

14 MR. ROMNEY: Objection. Calls for speculation.

15 JUDGE STEINBERG: Sustained.

16 BY MS. LANCASTER:

17 Q How about any federal government job as a document  
18 examiner?

19 MR. ROMNEY: Objection. Calls for speculation on  
20 the part of the witness.

21 MS. LANCASTER: She may know that, Your Honor.

22 THE WITNESS: I don't know, actually.

23 BY MS. LANCASTER:

24 Q Have you applied for any?

25 A No.

1 Q So you've never been turned down for one?

2 A I've never been turned down for one.

3 Q Doesn't interest you?

4 MR. ROMNEY: Objection. Argumentative.

5 JUDGE STEINBERG: Sustained.

6 (Pause.)

7 MS. LANCASTER: Your Honor, we would object to  
8 Ms. Edison being qualified as a document analyst in this  
9 case and being allowed to testify as such.

10 JUDGE STEINBERG: Okay. I'd like to hear  
11 argument, first Mr. Romney and then Mr. Pedigo and then  
12 Ms. Lancaster and then I'll rule.

13 MR. ROMNEY: Your Honor, the standard  
14 qualification for any expert witness is someone who has some  
15 specialized expertise or training that will assist the  
16 finder of fact in coming to its understanding of the issues.  
17 Clearly Ms. Edison meets those qualifications. In fact, the  
18 expert witness that was propounded by the government in this  
19 particular case has testified that she testified in court  
20 before she received any sort of a certification. So,  
21 Your Honor, I think that the issues, while they may go to  
22 the weight that the Court would give the testimony, they  
23 certainly do not detract from the admissibility of this  
24 person as an expert witness.

25 JUDGE STEINBERG: Mr. Pedigo?

1           MR. PEDIGO: With regard to the questions about  
2 the ABA and their negative assessment of WADE, I would just  
3 bring to the Court's attention that many lawyers are  
4 dissatisfied with the positions the ABA takes on a number of  
5 topics, so I would hope that plays no part in the Court's  
6 ruling on the admissibility or receiving evidence from this  
7 expert witness.

8           JUDGE STEINBERG: Ms. Lancaster?

9           MS. LANCASTER: Your Honor, in response, while it  
10 is true that Ms. Bolsover stated that she had -- I believe  
11 her first case, the time she had appeared in court she had  
12 not been yet certified by ABFDE, she also testified she had  
13 worked in a government lab under qualified examiners and had  
14 examined thousands of documents and had an extensive  
15 three-year training period before she ever did anything in  
16 that matter. Before us, we've got someone whose  
17 qualifications have never even been tested. This is the  
18 first time they've ever been tested. She's handled 12 cases  
19 total. She's never worked in a lab. She's not had any  
20 long-term resident training, full-time for any years,  
21 really. She's taken some courses at yearly meetings similar  
22 to when we all go off for the annual bar meeting and we know  
23 how that goes. Or we go to CLE classes. We know how those  
24 are. I mean, I would assert that her classes are probably  
25 very similar, conducted in a similar manner, even the CLE

1 classes where you go, you don't spend the entire time, but  
2 even giving her credit that she spent the entire time, she  
3 does not meet the minimal qualifications that would be  
4 needed for her testimony to have any weight in this matter  
5 and I would object to her being qualified as a witness, as  
6 an expert.

7 JUDGE STEINBERG: Okay. I'm going to sustain the  
8 objection for the reasons stated by Ms. Lancaster, but what  
9 I would propose to do is to take Ms. Edison's testimony as  
10 an offer of proof, if Mr. Romney wishes to do it that way,  
11 and that way if my ruling is reversed at a later point in  
12 time, if it's appealed and reversed, then the testimony and  
13 all the cross-examination will be in the record for the  
14 reviewing party to take a look at. But that is up to  
15 Mr. Romney, however he wants to handle it.

16 Would you like to think about it?

17 MR. ROMNEY: I would.

18 JUDGE STEINBERG: Okay. You want to take a lunch  
19 break and then think about it?

20 MR. ROMNEY: That would be fine.

21 JUDGE STEINBERG: Okay. Yes. Let's come back at

22 2:15.

23 (Whereupon, at 1:15 p.m., a recess was taken.)

24 //

25 //



A F T E R N O O N   S E S S I O N

(2:18 p.m.)

JUDGE STEINBERG: Before we broke for lunch, I offered Mr. Romney the opportunity to take Ms. Edison's testimony on an offer of proof basis and allow him to have the lunch hour to think about that.

Have you reached a decision on that, Mr. Romney?

MR. ROMNEY: Your Honor, I have. I'd like to preface my remarks.

JUDGE STEINBERG: Certainly.

MR. ROMNEY: In putting together Ms. Edison's testimony, we were clearly obviously without the benefit of Judge's Exhibit No. 3, the March 5, 2001 report. I will note for the Court that on Judge's Exhibit No. 5 that we had certainly been afforded immediate access to the first report of Ms. Bolsover, apparently it was given to Ms. Lancaster on the 21st of February and we got a copy that very same day. The testimony that we had desired to adduce from Ms. Edison went to many of the very same issues that were addressed in the March 5th report, which were obviously lacking from the first report that prepared by Ms. Bolsover.

In light of the Court's ruling and in light of the testimony that has been adduced so far, we apologize to the Court for any inconvenience. I think we could have been spared a lot of money and perhaps even some of the questions

1 of the witnesses could have been done a little bit  
2 differently and I know that I certainly would have handled  
3 some of the questions of some of the witnesses a little bit  
4 differently had Ms. Bolsover's final report been available  
5 earlier. I think it went to a lot of the issues that  
6 particularly some of the Sumpter women would have been asked  
7 and how those questions may have been directed and I am  
8 sorry that I didn't have the opportunity to have that  
9 report. But in light of those issues, Your Honor, and in  
10 light of the Court's ruling on your perception of the  
11 qualifications of Ms. Edison, we would elect not to put her  
12 on at this time and we will stand and rely upon the expert  
13 opinion of Ms. Bolsover that's already been adduced at this  
14 trial so far.

15 JUDGE STEINBERG: Mr. Pedigo?

16 MR. PEDIGO: Yes. Just one other thing,  
17 Your Honor. I do quibble with the problem provided to  
18 Ms. Bolsover. She referred to a letter --

19 JUDGE STEINBERG: Which exhibit are you looking  
20 at, so I can be on the same page?

21 MR. PEDIGO: Yes, Your Honor. It is Judge's  
22 Exhibit 3. And Ms. Bolsover testified that although she  
23 didn't know anything really about the nature of the  
24 proceedings here, she was advised by Ms. Lancaster's letter,  
25 which is Judge's Exhibit 4, about the allegation of a cut